

JCK INFRASTRUCTURE DEVELOPMENT LIMITED

VIGIL MECHANISM OR WHISTLE BLOWER POLICY

1. Preface:

JCK Infrastructure Development Limited (“The Company”) is committed to complying with the relevant laws that applies to it and particular to assure that the business is conducted with highest standards of integrity, professionalism and ethical behaviour. The potential violations of the Companies polices or applicable laws needs to be recognized and addressed promptly. As a result of this the Company will maintain a workplace that facilitates the reporting of potential violations of the Companies policies and applicable laws. Stakeholders, including individual employees and their representative bodies must be able to freely communicate their concerns about illegal or unethical practices and free from any fear of retaliation.

2. Duty to Report:

Everyone is required to report to the Company any suspected violation of any law that applies to the Company and any suspected violation of the Company’s Code of Business Conduct and Ethics. Violation shall include possible accounting and financial reporting violations, Insider Trading, Competition and Fair Dealing, Discrimination and Harassment, bribery or violations of the anti-retaliation aspects of this Policy. Retaliation includes adverse actions, harassment or discrimination in your employment relating to your reporting of a suspected violation.

One should not fear any negative consequences of reporting violation because retaliation for reporting suspected violations is strictly prohibited by Company policy. Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary actions, including possible termination of employment.

3. Procedure :

All Protected Disclosures (a concern raised by a written communication made in good faith that discloses or demonstrates information that may evidence unethical or improper activity) concerning financial/accounting matters should be addressed to the Chairman of the Audit Committee of the Company for investigation.

In other cases, suspected violations must be reported to immediate supervisor/Head of the Department.

If there is any reason to believe that the immediate supervisor/Head of the Department are involved in the suspected violation or from whom there is fear of retaliation, the report may be made directly to the Chairman of the Audit Committee by sending him/her an e-mail.

The Reporting of suspected violations can be done in person or through any electronic means by disclosing name or anonymously.

The report should include as much information as available about the suspected violation as can be provided. Where possible, it should describe the nature of violation, names of persons

involved, description of documents related to violations and time frame during which the suspected violation occurred. Where the identity is disclosed, the discloser may be contacted for further information.

All reports under this Policy will be promptly investigated, and all information disclosed during the course of investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. It is the duty of all employees to cooperate with the investigation and any failure of the same or providing false information can be the basis for disciplinary action. If, at the end of the conclusion of the investigation, the Company determines that a violation has occurred, the Company will take effective remedial action against the accused party, up to and including termination.

Use of confidential information for personal gain is strictly prohibited.

Report on adverse action against any person for complaining about, reporting or participating and assisting in the investigation, of reasonable violation of any law or this Policy, will be taken seriously by the Company. Strict disciplinary actions will be taken against such persons and they may also be subject to civil, criminal and administrative penalties.

4. Review and Maintenance of Documents:

The Audit Committee of the Company shall be responsible to review periodically the efficient and effective functioning of the vigil mechanism.

All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the applicable law or as decided by the Audit Committee.

5. Compliance:

All Directors and employees shall understand that compliance with applicable laws and the policy is important and as a Public Company, the integrity of the financial information of the Company is paramount. Further, you will report any suspected violations of the Company's Code of Business Conduct and Ethics and any other applicable laws in accordance with this Policy. The Company is committed to a work environment free of retaliation for any person who have raised concerns regarding violations and it is your duty to abide by this.

6. Amendments:

The Board of Directors, on its own and / or as per the recommendations of the Audit Committee may amend this Policy as and when deemed fit. Any or all provisions of this Policy would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, which make the provisions laid down under this Policy inconsistent with such amendment(s), clarification(s), circular(s) etc. then such amendment(s), clarification(s), circular(s) etc. shall

prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

7. Governing Law :

This Policy shall be governed by the Companies Act, 2013 read with Rules made thereunder and the applicable SEBI Regulations.